

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- V. -

TURKIYE HALK BANKASI, A.S.,
a/k/a “Halkbank,”

Defendant.

S6 15 Cr. 867 (RMB)

Michael DeLuca, being duly sworn, deposes and says:

1. I am a Paralegal Specialist in the office of Geoffrey S. Berman, United States Attorney for the Southern District of New York, where I am currently assigned to the Terrorism and International Narcotics Unit. I make this declaration based on information and records maintained by the U.S. Attorney's Office and records I have obtained and reviewed from publicly available sources.

2. Attached hereto as Exhibit 1 is a true and correct copy of an email dated October 15, 2019 from Assistant United States Attorney to Andrew Hruska, Esq., of King & Spalding LLP (“K&S”).

3. Attached hereto as Exhibit 2 is a true and correct copy of an email dated October 16, 2019 from AUSA Lockard to Mr. Hruska.

4. Attached hereto as Exhibit 3 is a true and correct copy of an email dated October 18, 2019 from William Johnson, Esq. of K&S to members of the U.S. Attorney's Office.

5. Attached hereto as Exhibit 4 is a true and correct copy of an email dated October 23, 2019 from Assistant United States Attorney David W. Denton, Jr. to Mr. Hruska.

6. Attached hereto as Exhibit 5 is a true and correct copy of an email dated October 23, 2019 from AUSA Denton to Halkbank, with attachments omitted.

7. Attached hereto as Exhibit 6 is a true and correct copy of an email dated October 23, 2019 from AUSA Denton to Tahsin Yazar of the Turkish Ministry of Treasury and Finance, with attachments omitted.

8. Attached hereto as Exhibit 7 are true and correct copies of delivery receipts dated October 23, 2019.

9. Attached hereto as Exhibit 8 is a true and correct copy of a letter from Federal Express to the U.S. Attorney's Office dated November 5, 2019.

10. Attached hereto as Exhibit 9 is a true and correct copy of an email dated December 9, 2019 from AUSA Lockard to Mr. Hruska and others at K&S.

11. Attached hereto as Exhibit 10 is a true and correct copy of an email dated December 9, 2019 from AUSA Lockard to Halkbank, with attachments omitted.

12. Attached hereto as Exhibit 11 is a true and correct copy of an email dated December 9, 2019 from AUSA Lockard to Mr. Yazar, with attachments omitted.

13. Attached hereto as Exhibit 12 are delivery receipts dated December 9, 2019.

14. Attached hereto as Exhibit 13 is a true and correct copy of a public disclosure issued by Halkbank, dated January 13, 2014, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/Disclosure_of_Events/2014/january/To_the_Attention.pdf.

15. Attached hereto as Exhibit 14 is a true and correct copy of a public disclosure issued by Halkbank, dated January 30, 2014, available at

https://www.halkbank.com.tr/images/misc/English/investor_relations/Disclosure_of_Events/2014/Our_Bank_Has_Filed_A_Criminal_Complaint_31012014.pdf.

16. Attached hereto as Exhibit 15 is a true and correct copy of a public disclosure issued by Halkbank, dated March 11, 2014, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/Disclosure_of_Events/2014/march/News_Reports_in_the_Media.pdf.

17. Attached hereto as Exhibit 16 is a true and correct copy of a public disclosure issued by Halkbank, dated March 22, 2016, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/financial_info/Annual_reports/Annual_reports_2013.pdf.

18. Attached hereto as Exhibit 17 is a true and correct copy of a public disclosure issued by Halkbank, dated March 28, 2016, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/Disclosure_of_Events/2016/march/220316About%20NewsonMediaTransactionsofIRAN.PDF.

19. Attached hereto as Exhibit 18 is a true and correct copy of a public disclosure issued by Halkbank, dated March 30, 2017, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/Disclosure_of_Events/2017/mar/300317About%20_News_on_Media.pdf.

20. Attached hereto as Exhibit 19 is a true and correct copy of a public disclosure issued by Halkbank, dated May 12, 2017, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/Disclosure_of_Events/2017/may/May_12_2017_About_News_on_Media.pdf.

21. Attached hereto as Exhibit 20 is a true and correct copy of a public disclosure issued by Halkbank, dated November 30, 2017, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/Disclosure_of_Events/2017/nov/Nov%2030%202017-About%20News%20on%20Media.pdf.

22. Attached hereto as Exhibit 21 is a true and correct copy of a public disclosure issued by Halkbank, dated January 4, 2018, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/Disclosure_of_Events/2018/jan/Jan%2004%202018-About%20the%20Case%20in%20the%20USA%20.pdf.

23. Attached hereto as Exhibit 22 is a true and correct copy of a public disclosure issued by Halkbank, dated October 16, 2019, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/Disclosure_of_Events/2019/oct/Oct%2016%202019-Indictment%20Against%20the%20Bank%20by%20U_S_%20Attorney's%20Office%20for%20the%20Southern%20District%20of%20New%20York%20.pdf.

24. Attached hereto as Exhibit 23 is a true and correct copy of Halkbank's 2013 Annual Report, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/financial_info/Annual_reports/Annual_reports_2013.pdf.

25. Attached hereto as Exhibit 24 is a true and correct copy of Halkbank's 2018 Annual Report, available at https://www.halkbank.com.tr/images/channels/English/investor_relations/financial_info/Annual_reports/2018%20annualreporteng.pdf.

26. I declare under penalty of perjury, pursuant to Title 28, United States Code, Section 1746, that the foregoing is true and correct.

Dated: New York, New York
January 21, 2020



Michael DeLuca
Paralegal Specialist, U.S. Attorney's Office